

REMARKS/ARGUMENTS:

Claims 1-3 and 5-10 are pending in the present application. Claims 1-3 and 5-10 stand rejected. Claims 1, 2, 6, and 7 are herein amended.

The Examiner rejected claims 1-3 and 5-10 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 5,596,569 to Madonna et al. (hereinafter Madonna) in view of U.S. Patent No. 5,497,373 to Hulen et al. (herein after Hulen).

Regarding claim 1, the Examiner stated that Madonna fails to teach that the first and second modules are running the same protocol. In view of this, the Examiner cited Hulen, stating that Hulen teaches that the first and second modules are running the same protocol for a purpose of converting the same formats or same information among other subscriber lines. Applicant respectfully disagrees with the Examiner's assertion.

In Hulen, a multimedia interface (MMI) is used to interface to a variety of network interfaces, which may include different protocols (e.g. E1 and T1). Hulen then uses a line interface module to convert the data from a telecommunications protocol to a series of frames and superframes of information, wherein the frames and superframes are then routed to one or more DSPs. Thus, Hulen can utilize multiple different telecommunications protocols, all of which are run on their respective interfaces. Stated differently, in Hulen a T1 protocol runs only on a T1 interface, and an E1 protocol only runs on an E1 interface. The MMI receives the T1 protocol data and converts it into frames and superframes, and also receives the E1 protocol data and converts that to frames and superframes.

In contrast to Madonna and Hulen, amended claim 1 recites in part:

a first telecommunications interface running a first telecommunications protocol ... a second telecommunications interface .. being different from said first telecommunications interface, said second telecommunications interface running said first telecommunications protocol...

Thus, in claim 1 a first interface runs a first protocol (e.g. a T1 interface running a T1 protocol) a second interface which is different that the first interface (e.g. an E1 interface) is also running the first protocol (thus the E1 interface is running the T1 protocol). Neither Madonna nor Hulen, taken alone or in combination, recite two different interfaces running the same protocol. Even if one were to consider the frames and superframes of Hulen as a protocol, this would still not read on claim 1 since this frame and superframe protocol is not running on a

second interface, but instead running between the MMI and the DSPs. Applicants have amended claim 1 to clearly recite that the first and second interfaces are telecommunications interfaces and that the first protocol run by each interface is a telecommunication interface. In view of the above claim 1 is believed distinguishable over Madonna and Hulen. Claims 2, 3, and 5-10 depend from claim 1 and are believed allowable as they depend from a base claim which is believed allowable.

Applicants appreciate the courtesy extended to Applicants representative in a phone call on June 14, 2004. As discussed in the phone call, the claims have been amend as described above, and are now believed to be in condition for allowance. Further, Applicants believe that no additional search is required, since Applicants amendment merely changed the claims to provide additional detail and that any search done on the original claims covers the present claim language.

In view of the above, the Examiners rejections are believed to have been overcome, placing claims 1-3 and 5-10 in condition for allowance and reconsideration and allowance thereof is respectfully requested.

The Assistant Commissioner is hereby authorized to charge payment of any additional fees associated with this communication or credit any overpayment to Deposit Account No. 50-0901.

Respectfully submitted,

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